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*Attorneys for Defendants Donald W. Ashley and Clarence A. "Jackie" Lewis*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

CATHY WOODS (A/K/A ANITA CARTER), by and through her Personal Representative, LINDA WADE,	)	CASE NO.: 3:16-CV-00494 -MMD-DJA
	)	
	)	
	)	
Plaintiff,	)	<b>DEFENDANT CLARENCE A.</b>
v.	)	<b>"JACKIE" LEWIS AND DONALD W.</b>
	)	<b>ASHLEY'S UNOPPOSED MOTION</b>
CITY OF RENO, NEVADA, LAWRENCE	)	<b>FOR EXTENSION OF TIME TO</b>
C. DENNISON, DONALD W. ASHLEY,	)	<b>RESPOND TO PLAINTIFF'S</b>
CLARENCE A. "JACKIE" LEWIS,	)	<b>MOTION TO AMEND ANSWER TO</b>
CALVIN R. X. DUNLAP, WASHOE	)	<b>ONE REQUEST FOR ADMISSION</b>
COUNTY, NEVADA, DOUGLAS	)	
MATTHEW BURKS, M.D., JOHN L.	)	
KIMPTON,	)	
Defendants.		

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S  
 MOTION TO AMEND ANSWER TO ONE REQUEST FOR ADMISSION**

NOW INTO COURT, through undersigned counsel, come Defendants, Clarence A. "Jackie" Lewis and Donald W. Ashley, who move for their first extension of time to respond to Plaintiff's Motion to Amend Answer to One Request for Admission in this matter, as follows:

1. 1

2 The deadline to respond to Plaintiff's motion in this matter is currently April 23, 2020.

2. 3

4 Undersigned counsel is working from home due to the COVID-19 pandemic.

3. 5

6  
7 On April 22, 2020, a tornado struck and counsel has lost all power and internet at his home.  
8 Counsel is unable to remotely access his file materials and systems necessary to complete and file the  
9 opposition.

4. 10

11 Counsel respectfully requests a brief extension until Monday, April 27, 2020, within which to  
12 respond to Plaintiff's Motion to Amend Answer to One Request for Admission.  
13

5. 14

15 Plaintiff does not oppose this request.

16 WHEREFORE, for the reasons set forth above, Defendants request an order extending the  
17 deadline to respond to Plaintiff's Motion to Amend Answer to One Request for Admission, up to  
18 and including Monday, April 27, 2020.  
19

20 Respectfully submitted,

21 PETTIETTE, ARMAND, DUNKELMAN,  
22 WOODLEY, BYRD & CROMWELL, L.L.P.


23 s/ Edwin H. Byrd, III  
24 Edwin H. Byrd, III, La. Bar No. 19509  
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And

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“IT IS SO ORDERED:

DATED: April 27, 2020

  
Daniel J. Albregts  
United States Magistrate Judge

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has this date been served upon the following counsel of record by filing it on the Court’s CM/ECF System:

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Shreveport, Louisiana this the 23 day of April, 2020.

s/ Edwin H. Byrd, III  
OF COUNSEL